

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO.: 15CR10146

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	MOTION FOR PERMISSION TO
)	TRAVEL OUT OF STATE
JUAN LARA)	
_____)	

Now comes the Defendant, Juan Lara, in the above-captioned matter and hereby moves this Honorable Court to grant him permission to travel out of state despite the condition(s) of his pre-trial release.

As reasons, the Defendant is currently released and subject to conditions per order of this court. The Defendant is seeking permission to travel to Yonkers, New York from December 11, 2015 returning December 13, 2015. This trip is through his church and he will be attending a type of retreat located at the Residence Inn Marriott Hotel, 7 Executive Boulevard, Yonkers, NY; he will also be staying at this location.

The Defendant has been in full compliance with the term of his release.

Wherefore, the Defendant prays this Honorable Court allow his motion.

Respectfully submitted,

/s/ Frank D. Camera
Frank D. Camera
B.B.O. #635930
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Date: December 4, 2015

CERTIFICATE OF SERVICE

I, Frank D. Camera, hereby certify that this document filed through the ECF system was sent electronically to the registered participants as identified on the Notice of Electronic filing on December 4, 2015.

/s/ Frank D. Camera